

**UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	No. 1:21CR00057-1 (MN)
)	
ZHI DONG)	The Honorable Maryellen Noreika
)	
Defendants.)	

DEFENDANT'S SENTENCING MEMORANDUM

NOW COMES the Defendant, ZHI DONG, through his attorney, MICHAEL D. WALSH, and provides the following as a sentencing memorandum and PSI objection(s), states as follows:

PART A. THE OFFENSE

Defendant has no objection to the statements as to the Charge(s) and Conviction(s).

PART B. DEFENDANT'S CRIMINAL HISTORY

Defendant has no objections.

PART C. OFFENDER CHARACTERISTICS

Defendant submits the following in addition to the Probation Department report. Mr. Gong continues to reside with his family at the address contained in the PSR. He is married and he and his wife have an eight (8) year old daughter. The Defendant and his wife share the responsibility of caring for and raising their daughter.

Defendant continues with his self-employment in the automobile repair business. He was formally educated in China in the Auto Industry as a major in his higher education. He specialized/majored in Repair.

It is worth noting that Mr. Dong has applied for employment with DART which he advises is the rapid transit system in the area. He is seeking employment in the repair area of the transit system.

PART D AND E. SENTENCING OPTIONS AND DEPARTURES

Defendant has accepted responsibility for his actions and his conduct here is not one that he wishes to repeat. This appears to be a one-time event in this Defendant's life. He made a terrible judgment decision to make some quick money.

Since he entered his guilty plea, Mr. Dong has continued with his effort to rehabilitate himself and put this conduct behind him. The Government has filed its request for a departure. The government's Motion outlines the reasons for the departure request. It would be fair to say that his attempts to assist were extensive and over a long period of time.

Defendant respectfully requests that given the nature of the crime and his lack of criminal background and the Government's departure request, the Defendant should receive a period of probation or alternatively, home confinement/house arrest of in lieu incarceration commensurate with his involvement and lack of prior criminal conduct.

Respectfully submitted,
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